

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

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| Linquista White, <i>et al.</i> , <div style="text-align: center;">Plaintiffs,</div> <div style="text-align: center;">v.</div> Kevin Shwedo, <i>et al.</i> , <div style="text-align: center;">Defendants.</div> | Civil Action No. 2:19-cv-03083-RMG |
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JOINT MOTION FOR A SCHEDULING ORDER

Pursuant to the Court’s Order of December 2, 2019 (ECF No. 39), the Parties met and conferred telephonically to discuss a schedule to govern the submission of anticipated pleadings and the briefing of pending and anticipated motions in this matter. The Parties thus jointly and respectfully move for entry of an order adopting the following schedule:

**Joint Proposed Schedule for Anticipated Pleadings and
Briefing of Pending and Anticipated Motions**

Friday, December 20, 2019: Defendant Kevin Shwedo must file any Answer to Plaintiffs’ Class Action Complaint for Injunctive and Declaration Relief (“Complaint”) (ECF No. 1).

Friday, January 10, 2020: Defendants Shwedo and Ralph K. Anderson III must file any brief in opposition to Plaintiffs’ motion for class certification (ECF No. 8).

Defendant Shwedo must file any brief in opposition to Plaintiffs’ motion for a preliminary injunction (ECF No. 35).¹

¹ Counsel for Defendant Shwedo are appreciative of the Court’s sua sponte extension of the deadline for this filing until January 6, 2020. Because of concerns with the volume of material which must be reviewed, counsel for Defendant Shwedo requested that counsel for Plaintiffs consent to have that deadline moved back several days, from January 6, Monday of the first week of January, to January 10, Friday of that same week. Counsel for Plaintiffs graciously consented to that request, and Defendant Shwedo respectfully requests that the Court grant this unopposed short extension.

Defendant Anderson must file any Answer or motion in response to the Complaint.

Friday, January 17, 2020: Plaintiffs must file any Amended Complaint.

Friday, January 24, 2020: Plaintiffs must file any brief in reply to Defendants Shwedo and Anderson's opposition to Plaintiffs' motion for class certification.

Plaintiffs must file any brief in reply to Defendant Shwedo's opposition to Plaintiffs' motion for a preliminary injunction.

Friday, February 7, 2020: Plaintiffs must file any brief in opposition to any motion by Defendant Anderson made in response to the Complaint.

Friday, February 14, 2020: Defendant Anderson must file any brief in reply to Plaintiffs' opposition to any motion by Defendant Anderson made in response to the Complaint.

Plaintiffs respectfully request that the Court schedule a hearing on Plaintiffs' motion for a preliminary injunction (ECF No. 35) and motion for class certification (ECF No. 8) that will take place as soon as practicable for the Court following the completion of briefing of these motions on January 24, 2019. Because Defendant Shwedo has not formulated his response to the motion for preliminary injunction, he at present neither consents to nor opposes this request for a hearing, but instead would ask that the Court set a hearing after his response has been filed. Plaintiffs' motion for a preliminary injunction is directed only against Defendant Shwedo, and not against Defendant Anderson. During the parties' meet and confer, moreover, counsel for Defendant Shwedo represented that he intends to submit an Answer on or before December 20, 2019, rather than filing a motion in response to Plaintiffs' Complaint. All parties thus agree that any hearing on Plaintiffs' motion for a preliminary injunction and Plaintiffs' motion for class certification need not wait for the completion of briefing on any motion filed

by Defendant Anderson in response to the Complaint.

DATED this 10th day of December, 2019.

Respectfully submitted by,

s/ Susan K. Dunn

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